

IPHC-2024-PP-03

Revised and adopted: 8 February 2024

#### WHISTLE BLOWER POLICY

# The International Pacific Halibut Commission (IPHC),

**RECOGNISING** the need to encourage employees and stakeholders to report any suspected illegal activities, unethical behavior, or violations of the IPHC policies and procedures;

**RECOGNISING** the need for comprehensive details regarding the whistle-blower policy to be provided on the IPHC website for public inspection;

**ADOPTS** in accordance with Regulation 12 (Internal Controls), paragraph 10 of the IPHC Financial Regulations (2024), that:

## **Purpose:**

1. The purpose of this whistle-blower policy is to encourage employees and stakeholders to report any suspected illegal activities, unethical behavior, or violations of the International Pacific Halibut Commission (IPHC) policies and procedures. This policy aims to provide a safe and confidential environment for reporting concerns and ensures protection against retaliation.

### Scope:

2. This policy applies to all employees, contractors, suppliers, customers, and stakeholders of the IPHC. It covers any concerns related to fraud, corruption, discrimination, harassment, safety violations, financial misconduct, or any other misconduct that may harm the company or its stakeholders.

# **Reporting Procedure:**

- 3. Any individual with a whistle-blower concern should report it to their immediate supervisor or the designated whistle-blower officer.
- 4. If the concern involves the immediate supervisor or the designated whistle-blower officer, it should be reported to the next level of management or the appropriate authority.
- 5. Concerns can be reported verbally or in writing, ensuring that all relevant details are provided for proper investigation.

## **Protection and Confidentiality:**

- 6. Whistle-blowers will be protected against any form of retaliation or adverse action for reporting concerns in good faith.
- 7. All reports will be treated with strict confidentiality, and the identity of the whistle-blower will be disclosed only to those directly involved in the investigation, unless required by law.



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8. Any employee found to be retaliating against a whistle-blower will be subject to disciplinary action, up to and including termination.

# **Investigation and Follow-Up:**

- 9. All reports will be promptly and thoroughly investigated by the appropriate authority.
- 10. The investigation will be conducted impartially, with due process and confidentiality.
- 11. Whistle-blowers will be kept informed of the progress and outcome of the investigation to the extent that it does not jeopardize confidentiality or compromise the investigation.
- 12. Appropriate actions will be taken based on the findings of the investigation, including corrective measures, disciplinary actions, and necessary policy revisions.

#### **Annual Review:**

- 13. This whistle-blower policy will be reviewed annually to ensure its effectiveness and compliance with any regulatory changes. Any revisions or updates will be communicated to all employees and stakeholders.
- 14. We encourage all individuals to come forward with their concerns and help maintain a culture of integrity, transparency, and accountability within our organisation.